REMARKS

Claims 1-38 are pending in the application. Claims 35 and 36 stand objected to because of informalities. Claims 16 and 28-30 stand rejected as allegedly being anticipated under 35 U.S.C. § 102(b) by Sheridon, U.S. Patent No. 4,126,854 ("Sheridon"). Claims 1 and 13-15 stand rejected under 35 U.S.C. § 103 as allegedly being unpatentable over Sheridon. Claims 2, 4, 17, 19, 31, 32, and 37 stand rejected under 35 U.S.C. § 103 as allegedly being unpatentable over Sheridon in view of Koshimizu et al., U.S. Patent No. 5,566,012 ("Koshimizu et al."). Claims 3 and 18 stand rejected under 35 U.S.C. § 103 as allegedly being unpatentable over Sheridon in view of Wen et al., U.S. Patent No. 6,064,410 ("Wen et al."). Claims 5-7, 20-22, and 33-35 stand rejected under 35 U.S.C. § 103 as allegedly being unpatentable over Sheridon in view of Mydlarz et al., U.S. Patent No. 6,518,009 ("Mydlarz et al."). Claims 8 and 23 stand rejected under 35 U.S.C. § 103 as allegedly being unpatentable over Sheridon in view of Richley, U.S. Patent No. 5,900,858 ("Richley"). Claims 9-12 and 24-27 stand rejected under 35 U.S.C. § 103 as allegedly being unpatentable over Sheridon in view of Nakamura et al., U.S. Patent No. 5,478,684 ("Nakamura et al."). Claim 36 stands rejected under 35 U.S.C. § 103 as allegedly being unpatentable over Sheridon and Koshimizu et al. and further in view of Hooker et al., U.S. Patent No. 6,554,463 ("Hooker et al."). Lastly, claim 38 stands rejected under 35 U.S.C. § 103 as allegedly being unpatentable over Sheridon and Koshimizu et al. and further in view of Yoshikawa et al., U.S. Patent No. 4,831,408 ("Yoshikawa et al."). Applicant respectfully traverses the objections and rejections of the claims. Reconsideration in light of the amendments and remarks is respectfully requested.

Claims 35 and 36 stand objected to because of informalities. Applicant has amended claims 35 and 36 to correct the informalities and, therefore, respectfully requests that the objections to claims 35 and 36 be withdrawn. Additionally, applicant has amended claims 1-31 to help clarify the invention that is claimed and to correct obvious typographical errors. None of the amendments is intended to narrow the scope of the claims. No new matter has been added thereby.

Each of claims 1-38 stands rejected as allegedly being unpatentable over Sheridon, considered either individually or in combination with one or more of Koshimizu et al., Wen et al., Mydlarz et al., Richley, Nakamura et al., Hooker et al., and Yoshikawa et al.

Independent claim 1, as amended, recites a method of imaging electronic paper that includes, *inter alia*, positioning a back plane electrode layer in front of a focused light source,

positioning a front plane electrode layer between an electrostatic display cell layer and the focused light source, and generating an electrical potential between the front plane electrode layer and the back plane electrode layer. Similarly, independent claim 16, as amended, recites a method of imaging electronic paper that includes, *inter alia*, positioning a back plane electrode layer in front of a focused light source, positioning a front plane electrode layer between a photoconductive layer and the focused light source, and generating an electrical potential between the front plane electrode layer and the back plane electrode layer. Still further, independent claim 31, as amended, recites an apparatus for imaging electronic paper that includes, *inter alia*, a front plane electrode electrically connected to a switchable voltage source, a back plane electrode electrically connected to the switchable voltage source, and a controller operatively coupled to the switchable voltage source, the controller causing the switchable voltage source to produce an electrical potential between the front plane electrode and the back plane electrode.

Despite the examiner's contention, Sheridon fails to disclose or even suggest each and every element recited by claims 1-38, namely, a front plane electrode layer and a back plane electrode layer, or a front plane electrode and a back plane electrode. To the contrary, Sheridon discloses a first grid 10 having a plurality of electrical conductors 10' and a second grid 12 having a plurality of electrical conductors 12'. An image is provided by sequentially coupling a source 19 to selected crossover points of the matrix or grid of electrodes 10' and 12', to thereby apply an electric field at the desired X and Y matrix intersection. (Column 3, lines 21-26; Fig. 7).

Applicant respectfully submits that the front plane electrode layer and the back plane electrode layer, as recited by each of claims 1-30, and the front plane electrode and the back plane electrode, as recited by each of claims 31-38, are not similar to the grid of electrodes taught by Sheridon. In fact, applicant explicitly stated in the detailed description section of the specification that "the front plane electrode 104 and the back plane electrode 106 are <u>not</u> arranged in a grid such that an electrical potential may be applied selectively at the desired resolution." (Page 4, line 23 to page 5, line 2) (emphasis added). Instead, "[a] voltage source 108 is connected between the entire front plane electrode 104 and, the entire back plane electrode 106." (Page 4, lines 10-12; FIGs 1 and 2). In this manner, a constant electrical potential may be generated between the front and back electrode planes. The generation of a constant electrical potential is not possible in an electrically addressable matrix or grid of electrodes due to the variations in potential that exist when an electrical potential is

selectively applied to individual intersection points in the grid. Moreover, an electrode plane is a solid, continuous structure that is less expensive than a grid of electrodes, as well as easier to manufacture than a grid of electrodes. Accordingly, a grid of electrodes is neither functionally nor structurally similar to a front plane electrode layer and a back plane electrode layer, as recited by claims 1-30, or a front plane electrode and a back plane electrode, as recited by claims 31-38.

Because Sheridon fails to disclose the claimed subject matter of pending claims 1-38, Sheridon does not anticipate the pending claims. Additionally, one of ordinary skill in the art would not be motivated to modify Sheridon to arrive at the claimed subject matter, because Sheridon does not teach or suggest that it would be possible or even desirable to make such a modification. Accordingly, Sheridon does not render claims 1-38 obvious therefrom.

In a similar manner, each of Koshimizu et al., Wen et al., Mydlarz et al., Richley, Nakamura et al., Hooker et al., and Yoshikawa et al. (all of which are also relied upon in the Office action) fails to disclose, teach, or suggest the claimed combination of elements recited in pending claims 1-38 for at least the same reasons described above. Therefore, none of these references, whether considered individually or in combination, renders the claimed subject matter of claims 1-38 unpatentable. For at least these reasons, claims 1-38 are allowable, and such action is solicited.

In view of the foregoing, applicant respectfully submits that the application as a whole is in a condition for allowance, and such action is requested at the examiner's earliest convenience. The examiner is invited to contact applicant's undersigned attorney with any questions or comments regarding this response or the application as a whole. If there are any additional fees or refunds required, the Commissioner is directed to charge or debit Deposit Account No. 13-2855.

Respectfully submitted,

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